

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA . CRIMINAL NO.

v.

BRIAN HEWSON,

Defendant.

I N F O R M A T I O N

Count 1

18 U.S.C. § 1344

(Bank Fraud)

THE UNITED STATES ATTORNEY CHARGES:

From on or about October 1, 2008, the exact date being unknown to the United States Attorney, to on or about February 1, 2012, in the Middle District of Pennsylvania, and elsewhere, the defendant,

BRIAN HEWSON,

devised a scheme and artifice to defraud multiple financial institutions including, but not limited to, Citibank, a financial institution insured by the FDIC, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of Citibank and other financial institutions, by means of materially false and fraudulent pretenses, representations, and promises.

It was part of the scheme and artifice that the defendant wrongfully obtained checks and other banking information from clients of Hewson Contracting, a construction company under the control of the defendant, and thereafter used

materially false representations and deceit to wrongfully obtain funds from the banks of the clients. By way of example, the defendant caused forged checks payable from one client's checking account to be paid to Hewson Contracting and the defendant caused the forged checks to be deposited into a bank account of Hewson Contracting. On or about the dates listed below, as well as on other dates, the defendant executed and attempted to execute the scheme and artifice as set forth above, in that the defendant caused the forged checks listed below, payable to Hewson Contracting, to be deposited to a bank account under the control of the defendant:

<u>Check Number</u>	<u>Amount of Check</u>	<u>Date of Deposit</u>
611	\$4,000	January 13, 2012
613	\$28,000	January 13, 2012
601	\$22,000	January 27, 2012
602	\$25,000	January 31, 2012

In violation of Title 18, United States Code, § 1344.

Count 2
26 U.S.C. § 7206(2)
Aiding and Abetting the Preparation of a False Federal Income Tax Return)

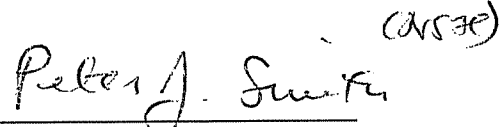
THE UNITED STATES ATTORNEY FURTHER CHARGES:

On or about April 15, 2010, in the Middle District of Pennsylvania and elsewhere, the defendant,

BRIAN HEWSON,

a resident of Canadensis, Pennsylvania, did wilfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of Brian Hewson for the calendar year 2009. The return was false and fraudulent as to a material matter, in that it represented that the defendant's taxable income was \$0, whereas, as the defendant then and there knew, the defendant's taxable income for that year was substantially more than that amount.

In violation of Title 26, United States Code, section 7206(2).

(over)

PETER J. SMITH
United States Attorney

Dated: 8-22-2013